

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

---

United States of America and States of the United  
States, ex rel. Patrick Donohue

Plaintiffs,

Civil Action No.: 20-cv-5396(GWH)

-vs-

RICHARD CARRANZA, in his official capacity as  
the former Chancellor of New York City Department of  
Education,

MEISHA PORTER, in her official capacity as the current  
Chancellor of the New York City Department of Education,  
NEW YORK CITY DEPARTMENT OF EDUCATION,  
NIAGARA FALLS PUBLIC SCHOOL DISTRICT,

MAKR LAURRIE, in his official capacity as Superintendent,  
BUFFALO PUBLIC SCHOOL DISTRICT,

KRINER CASH, in his official capacity as Superintendent,  
MASSACHUSETTS DEPARTMENT OF EDUCATION,  
SOMERVILLE PUBLIC SCHOOL DISTRICT,

MARY SKIPPER, in her official capacity as Superintendent,  
as Superintendent,

JEFFREY C. RILEY, in his official capacity as Superintendent,  
STAMFORD PUBLIC SCHOOL DISTRICT,

DR. TAMU LUCERO, in her official capacity as Superintendent,  
LOUDON COUNTY PUBLIC SCHOOL DISTRICT,

SCOTT A. ZIEGLER, in his official capacity as Superintendent,  
CAMDEN CITY PUBLIC SCHOOL DISTRICT,

KATRINA McCOMBS, in her official capacity as Superintendent,  
LOS ANGELES UNIFIED SCHOOL DSITRICT,

AUSTIN BEUTNER, in her official capacity as Superintendent,  
SAN DIEGO UNIFIED SCHOOL DISTRICT,

DR. LAMONT A. JACKSON, in his official capacity as Superintendent,  
and CINDY MARTEN, in her official capacity as former Superintendent,  
WAKE COUNTY PUBLIC SCHOOL DISTRICT,

Defendants.

---

---

**MOTION FOR ADMISSION  
PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, Robert E. Quinn hereby moves this Court for an Order for admission to practice Pro Hac Vice to appear as counsel for Buffalo Public School District and Kriner Cash in the above-captioned action.

I am in good standing of the bar of the State of New York and there are no pending disciplinary proceedings against me in any State or Federal Court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any Court. I have attached the affidavit pursuant to Local Rule 1.3

Respectfully Submitted,

Dated: March 2, 2022  
Buffalo, New York

**NATHANIEL KUZMA, ESQ.**  
General Counsel  
*Attorney for the Buffalo Defendants*

/s/ Robert E. Quinn  
By: Robert E. Quinn  
Assistant Legal Counsel  
65 Niagara Square, 713 City Hall  
Buffalo, New York 14202  
Tel.: (716) 816-3102

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

---

United States of America and States of the United  
States, ex rel. Patrick Donohue

Plaintiffs,

Civil Action No.: 20-cv-5396(GWH)

-vs-

RICHARD CARRANZA, in his official capacity as  
the former Chancellor of New York City Department of  
Education,

MEISHA PORTER, in her official capacity as the current  
Chancellor of the New York City Department of Education,  
NEW YORK CITY DEPARTMENT OF EDUCATION,  
NIAGARA FALLS PUBLIC SCHOOL DISTRICT,

MAKR LAURRIE, in his official capacity as Superintendent,  
BUFFALO PUBLIC SCHOOL DISTRICT,

KRINER CASH, in his official capacity as Superintendent,  
MASSACHUSETTS DEPARTMENT OF EDUCATION,  
SOMERVILLE PUBLIC SCHOOL DISTRICT,

MARY SKIPPER, in her official capacity as Superintendent,  
as Superintendent,

JEFFREY C. RILEY, in his official capacity as Superintendent,  
STAMFORD PUBLIC SCHOOL DISTRICT,

DR. TAMU LUCERO, in her official capacity as Superintendent,  
LOUDON COUNTY PUBLIC SCHOOL DISTRICT,

SCOTT A. ZIEGLER, in his official capacity as Superintendent,  
CAMDEN CITY PUBLIC SCHOOL DISTRICT,

KATRINA McCOMBS, in her official capacity as Superintendent,  
LOS ANGELES UNIFIED SCHOOL DSITRICT,

AUSTIN BEUTNER, in her official capacity as Superintendent,  
SAN DIEGO UNIFIED SCHOOL DISTRICT,

DR. LAMONT A. JACKSON, in his official capacity as Superintendent,  
and CINDY MARTEN, in her official capacity as former Superintendent,  
WAKE COUNTY PUBLIC SCHOOL DISTRICT,

Defendants.

---

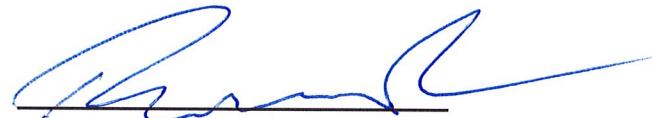
**AFFIDAVIT OF ROBERT E. QUINN**

STATE OF NEW YORK )  
COUNTY OF ERIE      )

**ROBERT E. QUINN**, being duly sworn, deposes and states:

1. My name is Robert. E. Quinn. I am over 21 years of age and have never been convicted of a felony.
2. I am an attorney practicing law in Erie County, New York. I have never been censured, suspended, disbarred or denied admission or readmission to any Court. I have not had any disciplinary proceedings against myself.
3. I am of sound mind and am fully competent to give this affidavit under oath.

The facts contained within this affidavit are within my personal knowledge.



Robert E. Quinn

Sworn to before me this  
2<sup>nd</sup> day of March 2022.

NOTARY PUBLIC

NATHANIEL JAMES KUZMA  
NOTARY PUBLIC, STATE OF NEW YORK  
QUALIFIED IN ERIE COUNTY  
Reg. No. 02KU6335269  
MY COMMISSION EXPIRES 01-25-2022



*Appellate Division of the Supreme Court  
of the State of New York  
Fourth Judicial Department*

*I, Ann Dillon Flynn, Clerk of the Appellate Division of the Supreme Court of the State of New York, Fourth Judicial Department, do hereby certify that*

*Robert Emmet Quinn*

*was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on February 26, 2009, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Administration Office of the Courts, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.*

*In Witness Whereof, I have hereunto set my hand in the City of Rochester on March 2, 2022.*



*Ann Dillon Flynn*

*Clerk of the Court*



ANN DILLON FLYNN  
CLERK OF THE COURT

NEW YORK STATE SUPREME COURT  
APPELLATE DIVISION, FOURTH DEPARTMENT  
M. DOLORES DENMAN COURTHOUSE  
50 EAST AVENUE, SUITE 200  
ROCHESTER, NEW YORK 14604  
(585) 530-3100 Fax (585) 530-3247



ALAN L. ROSS  
DEPUTY CLERK OF THE COURT

To Whom It May Concern

An attorney admitted to practice by this Court may request a certificate of good standing, which is the only official document this Court issues certifying to an attorney's admission and good standing.

An attorney's registration status, date of admission and disciplinary history may be viewed through the attorney search feature on [the website of the Unified Court System](#).

New York State does not register attorneys as active or inactive.

An attorney may request a disciplinary history letter from the [Attorney Grievance Committee of the Fourth Judicial Department](#).

Bar examination history is available from the [New York State Board of Law Examiners](#).

Instructions, forms and links are available on [this Court's website](#).

*Ann Dillon Flynn*  
Ann Dillon Flynn  
Clerk of the Court

Revised September 2021

[www.courts.state.ny.us/ad4](http://www.courts.state.ny.us/ad4)